



# Exhibit A

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

---

IN RE: PHARMACEUTICAL INDUSTRY                          }  
AVERAGE WHOLESALE PRICE                                  }  
LITIGATION    } MDL NO. 1456  
    }  
    } CIVIL ACTION NO. 01-CV-12257-PBS  
    }  
    } Judge Patti B. Saris  
    )

**AFFIDAVIT OF STEPHEN KNOWLES**

I, Stephen Knowles, being over eighteen years of age and competent to testify herein, depose and state as follows:

1. My name is Stephen S. Knowles. I am currently employed by Astellas US Holding, Inc. ("Astellas") as Senior Director, Accounting and Taxation.
2. Prior to my employment with Astellas, I was employed by Fujisawa Healthcare, Inc. ("FHI") from April 1, 1998 to March 31, 2005 as Senior Director, Accounting and Taxation. And prior to that, I was employed by Fujisawa USA, Inc. ("FUSA") from April 1, 1990 to March 31, 1998 as Director, Accounting.
3. FUSA was a Delaware corporation headquartered in Deerfield, Illinois. It was dissolved in December, 1998. Prior to its dissolution, it manufactured and sold branded and generic drugs.
4. FHI was a Delaware corporation headquartered in Deerfield, Illinois. It was dissolved in March, 2005. It manufactured and sold only branded drugs. Both FUSA and FHI were formerly wholly owned subsidiaries of Fujisawa Pharmaceutical Co., Ltd., a company organized under the laws of Japan and publicly traded in Japan.
5. On April 1, 2005, FHI was merged into a Delaware corporation now known as Astellas U.S. Holding, Inc. Its parent is a Japanese corporation, Astellas Pharma Inc. Astellas is the successor company to the FUSA and FHI, the entities named in the litigation for which I have provided this Affidavit.

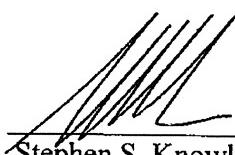
6. On May 31, 1998, FUSA sold its generic drug business to American Pharmaceutical Partners ("APP"). APP is a company incorporated in the state of Delaware, and is completely separate and distinct from FUSA, FHI and Astellas. APP has not been named as a defendant in this litigation.

7. The sale of FUSA's generic business to APP was an "arms length" transaction. It included the transfer of all equipment, personnel and records involved in manufacture and sale of every generic drug manufactured by FUSA. These drugs included: vinblastine sulfate; vancomycin hydrochloride; acyclovir sodium; dexamethasone sodium phosphate; doxorubicin hydrochloride; fluorouracil; gentamicin sulfate; atropine sulfate injection; and normal saline solution.

8. None of the drugs listed in the previous paragraph have been manufactured or sold by FUSA, FHI or Astellas since May 31, 1998. To my knowledge, no representation as to the price of the drugs listed in the previous paragraph were made by FUSA, FHI or Astellas since May 31, 1998, except to the extent such representations were necessary in connection with sales made prior to May 31, 1998.

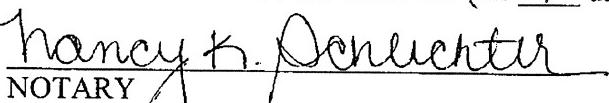
9. None of the three entities (*i.e.*, FHI, FUSA, Astellas) has ever produced triamcinolone acetonide under the category of J3301.

Further Affiant Sayeth Naught.



\_\_\_\_\_  
Stephen S. Knowles  
Astellas US Holding, Inc.

SUBSCRIBED and sworn before me this 14<sup>th</sup> day of June, 2006



Nancy K. Schlichter  
NOTARY

My commission expires \_\_\_\_\_

